

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

Omar Alsomali,

Plaintiff,

Case: 2:17-cv-13969-TGB-RSW  
Honorable Terrence G. Berg

vs.

Nissan Motor Company LTD.,  
and Nissan North America, Inc.,  
a Foreign Corporation,

Defendants.

**ORDER REGARDING PLAINTIFF’S SERVICE OF PROCESS  
ON NISSAN MOTOR COMPANY, LTD., AND  
DISCOVERY RESPONSE DEADLINES**

This matter having come before the Court by stipulation of the parties, and the Court being otherwise fully advised in the premises;

**IT IS ORDERED** that Nissan Motor Company, Ltd. (“NML”) will file a responsive pleading to Plaintiff’s Complaint, in this case only, without Plaintiff’s compliance with the service requirements of The Hague Convention.

**IT IS FURTHER ORDERED** that NML will accept service, in this case only, via certified mail at the following address:

Legal Department  
Nissan Motor Co., Ltd.  
1-1, Takashima 1-chome, Nishi-ku  
Yokohama-shi, Kanagawa 220-8686  
Japan

**IT IS FURTHER ORDERED** that NML will file its responsive pleading, in this case only, within thirty (30) days of receipt of Plaintiff's Complaint via certified mail at the aforementioned address.

**IT IS FURTHER ORDERED** that is not necessary that Plaintiff's Complaint be translated.

**IT IS FURTHER ORDERED** that courtesy copies of all of Plaintiff's mailings shall be provided directly to Defendants' undersigned counsel.

**IT IS FURTHER ORDERED** that NML and Nissan North America, Inc. ("NNA") will have an additional sixty (60) days, ninety (90) days total following service, to respond to any and all written discovery requests during this litigation.

**IT IS FURTHER ORDERED** that Plaintiff will have an additional thirty (30) days, sixty (60) days total following service, to respond to any and all written discovery requests during this litigation.

**IT IS FURTHER ORDERED** that Plaintiff must give at least sixty (60) days' notice in requesting the FRCP 30(b)(6) deposition(s) of any NML corporate representative(s).

**IT IS FURTHER ORDERED** that any FRCP 30(b)(6) deposition(s) of any NML corporate representative(s) will be conducted in either the Bloomfield Hills, Michigan or Los Angeles, California offices of Bowman and Brooke LLP, as chosen by Defendants' undersigned counsel.

**IT IS FURTHER ORDERED** that this stipulated order will not constitute an appearance on behalf of NML.

**IT IS SO ORDERED.**

/s/Terrence G. Berg

TERRENCE G. BERG

UNITED STATES DISTRICT JUDGE

DATED: February 26, 2018

**I STIPULATE TO ENTRY OF THE ABOVE ORDER:**

/s/William J. McHenry (with consent)

William J. McHenry (P38458)

Attorney for Plaintiff

/s/Thomas P. Branigan

Thomas P. Branigan (P41774)

Attorney for NML and NNA